

# STONE MAGNANINI LLP

COMPLEX COMMERCIAL LITIGATION

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December 30, 2013

**VIA FAX**

The Honorable Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*January 3, 2013*

*There is no reason to change the schedule the Court ordered on December 23, 2013 and to the extent the little is equal for a change, although a extension, it is DENIED. Failure to adhere to the schedule, as promulgated, may result in granting the moving party by default, and dismissal in failure to prosecute the action.*

Re: *The A Star Group Inc. v. Manitoba Hydro, et al., 13-cv-4501 (PAC)*

*So ordered  
Paul A. Crotty  
JES*

Dear Judge Crotty:

We appreciate Your Honor's Order granting this Firm's letter application to withdraw as counsel for the plaintiff corporation AStar in the above-referenced matter.

We write this letter to provide Your Honor with additional information relating to AStar that we had anticipated providing Your Honor in connection with Your Honor's consideration of the case schedule.

On or about November 27, 2013, AStar communicated to this Firm that AStar's CEO Samantha Kumaran would be taking maternity leave from AStar from December 15, 2013 through April 1, 2014, and AStar subsequently requested that the Firm seek a four-month stay of the case and cease all filings through at least April 15, 2013, in light of its CEO's medical circumstances. The Firm has made diligent efforts to respond to AStar, but it has been unable to communicate with AStar to date. We eventually served AStar with notice of our intent to withdraw from this case, and subsequently served AStar with our December 18, 2013 letter application to this Court.

We are currently serving AStar with notice of the Court's Order granting our withdrawal from this case, however, at present, we do not know AStar's status or its CEO's medical circumstances. For the foregoing reasons, we respectfully submit that Your Honor may wish to consider granting AStar additional time to find new counsel and respond to Defendants' motions to dismiss.

Hon. Paul A. Crotty, U.S.D.J.  
December 30, 2013  
Page 2 of 2

Please do not hesitate to contact this Firm if Your Honor has any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David S. Stone', with a long horizontal flourish extending to the right.

David S. Stone

cc: Samantha Kumaran  
CEO/President, The AStar Group, Inc. (via certified mail & e-mail)

All attorneys of record (via e-mail)